

# TSD File Inventory Index

Date March 10, 2005

Initial LM Knevel

Facility Name		<u>Univest USA (Bedford Park Facility)</u>	
Facility Identification Number		<u>LR 000 034 389</u>	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		1 Correspondence	
1 Correspondence		2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments		C.2 Compliance/Enforcement	<u>1</u>
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Preim. Investigation Memos	
1 Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP	7 Lab data Soil Sampling/Groundwater
6 RFI QAPP Correspondence	8 Progress Reports
7 Lab Data Soil Sampling/Groundwater	D.5 Corrective Action/Enforcement
8 RFI Progress Reports	1 Administrative Record 3008(h) Order
9 Interim Measures Correspondence	2 Other Non-AR Documents
10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	1 Forms/Checklists
1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
2 Interim Measures	1 Correspondence
3 CMS Workplan	2 Reports
4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
5 Stabilization	G.1 Risk Assessment
6 CMS Progress Reports	1 Human/Ecological Assessment
7 Lab Data Soil Sampling/Groundwater	2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	3 Enforcement Confidential
1 CMI Correspondence	4 Ecological - Administrative Record
2 CMI Workplan	5 Permitting
3 CMI Program Reports and Oversight	6 Corrective Action Remediation Study
4 CMI Draft/Final Reports	7 Corrective Action/Remediation Implementation
5 CMI QAPP	8 Endangered Species Act
6 CMI Correspondence	9 Environmental Justice

Note: Transmittal Letter to Be Included with Reports  
Comments \_\_\_\_\_

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Received by (Please Print Clearly) <i>[Signature]</i> B. Date of Delivery <i>2-26-04</i></p>	
<p>1. Article Addressed to:</p> <p>MR MARC LINOS BRANCH OPERATIONS MANAGER UNIVAR USA 8500 WEST 68TH STREET BEFORD PARK IL 60501</p>		<p>C. Signature <i>X [Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label) <i>7001 0320 0006 1452 0238</i></p>		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
<p>PS Form 3811, March 2001</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p>Domestic Return Receipt</p>	

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 25 2004

DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Marc Linos  
Branch Operations Manager  
Univar USA  
8500 West 68<sup>th</sup> Street  
Bedford Park, IL 60501

Re: Compliance Evaluation Inspection  
EPA I.D. No.: ILR 000 034 389

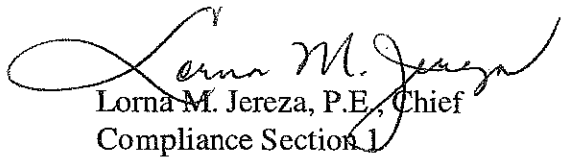
Dear Mr. Linos:

On July 25, 2003, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Univar USA facility in Bedford Park, Illinois (the facility). The purpose of the inspection was to evaluate the facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Standards Applicable to Generators of Hazardous Waste set forth at 35 Illinois Administrative Code Sections 722 and 725 [40 C.F.R. Part 262 and 265]. Enclosed please find a copy of our inspection report.

As of this writing, based upon information available to U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other hazardous waste regulations, or regulations under other environmental statutes. U.S. EPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Michael Valentino, of my staff, at (312) 886-4582.

Sincerely,

A handwritten signature in black ink, reading "Lorna M. Jereza". The signature is fluid and cursive, with a large initial "L" and "M".

Lorna M. Jereza, P.E., Chief

Compliance Section 1

Enforcement and Compliance Assurance Branch

Waste, Pesticides and Toxics Division

Enclosure

cc: Todd Marvel, Illinois EPA, w/encl

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

MEMORANDUM TO FILE

**FACILITY NAME:** Univar USA

**U.S. EPA ID No.:** ILR 000 034 389

**FACILITY ADDRESS:** 8500 West 68<sup>th</sup> Street  
Bedford Park, IL 60501

**RCRA DESIGNATION:** Large Quantity Generator and Transporter

**PRIORITY, SECTOR AND/OR  
PROCESS:** Waste consolidation and transport

**SIC CODE:** 5169 (Chemicals and Allied Products)

**NAICS CODE:** 42269

**DATE OF INSPECTION:** July 25, 2003

**FACILITY REPRESENTATIVES:** Marc Linos, Branch Operations Manager  
Univar USA

**U.S. EPA INSPECTOR:** Michael Valentino, Environmental Engineer  
Compliance Section 1, ECAB

**OTHER REGULATORY PERSONNEL:** None

---

**PREPARED BY:** Michael Valentino

**REVIEWED BY:** Lorna M. Jereza, P.E., Chief  
Compliance Section 1  
WPTD, ECAB

**Purpose of Inspection:**

The purpose of the inspection was to conduct a Compliance Evaluation Inspection (CEI) at the facility for management of its RCRA regulated waste.

**Facility Description:**

Univar USA (formerly Van Waters & Rodgers) operates a hazardous waste consolidation and repackaging facility located inside the Kinder Morgan Terminal at the Bedford Park, IL address above ("the facility"). Univar USA employs 110 people at this location which houses its regional, district and branch offices. The facility operates around three overlapping shifts, from 1:00 am to 9:30 pm, Mon-Fri. The facility receives and consolidates solid and liquid flammables and corrosives, as well as off-specification materials. The facility does not receive used oil and it does not store hazardous wastes in tanks. The facility includes two satellite accumulation areas (SAAs) and one 90-day hazardous waste accumulation area.

According to its 2002 Hazardous Waste Report, which was provided by the facility during the inspection, Univar USA reported the following waste streams and quantities for calendar year 2001:

WASTE STREAM	HAZARDOUS WASTE CODE	QUANTITY GENERATED <sup>1</sup>
Hypochlorite liquid	D002	5500 lbs
Ignitable organic acids	D001, D002	23,716 lbs
Ammonia liquid	D002	823 lbs
Ignitable solids (rags, filters)	D001	19,305 lbs
Ignitable non-halogenated solvents (IPA, ethanol)	D001, D035, F003, F005	39,476 lbs
Corrosive solids from floor sweepings	(None assigned)	2600 lbs
Oxidizing solids from floor sweepings	D001	2400 lbs
Flammable/ignitable paint from used material & cleanup	D001, D035, F003, F005	276 lbs
Formaldehyde with 11% Methanol from spill cleanup	U122, U154	3600 lbs

---

<sup>1</sup>The 2002 Hazardous Waste Report indicates units of measurement for the 13 waste streams identified in the report as either pounds (lbs) or gallons. Where gallons are used, the report provides the density of the waste stream, allowing for conversion to pounds, as indicated in column 3. Where density is provided (expressed in the 2002 Hazardous Waste Report in English units, lbs/gal), it is simply multiplied by the number of gallons generated to yield pounds.

Water with Toluene from spill cleanup	U220	1573 lbs
Water with Toluene from spill cleanup	U220	69,139 lbs
Damage container and formaldehyde	U122	501 lbs
Formaldehyde spill cleanup water rinsate from decontamination	U122	11,567 lbs

The facility warehouse includes 100% coverage with overhead sprinklers. Employees carry two-way radios and the facility is also equipped with a loudspeaker system in the warehouse area. Univar USA conducts monthly in-house testing of its fire extinguishers and sprinkler systems. Annual tests are conducted by Advance Fire & Safety (Burbank, IL).

Univar USA owns and operates 12 trucks for waste pickup and transport. Once wastes are repackaged at the facility, they are sent to three TSD facilities: Pollution Control Industries (East Chicago, IN), Heritage Environmental Services (Indianapolis, IN) and Clean Harbors.

#### **Facility Inspection and Observations:**

I arrived at the facility at 8:00 am. I announced myself and waited to be met by Marc Linos, Univar USA's Branch Operations Manager. I presented Mr. Linos with my enforcement credentials. We left the reception area for a nearby conference room. There I told Mr. Linos that I was at his facility to perform a RCRA hazardous waste inspection. I briefly outlined the areas I wished to see during the site walk-through as well as the documents I would need to review afterward. Mr. Linos provided a brief overview of operations before we set out on the site walk-through. I took 11 photographs during the inspection. These are provided as Attachment No. 1 to this report, "Photo Log."

We started out in the Corrosive Fill Room where I observed the SAA dedicated to that area. At the time of the inspection, the Corrosive Fill Room SAA included one 55-gallon PVC drum of hazardous waste and three 55-gallon PVC drums of non-hazardous waste. (Photo #1). The drums were neatly arranged and resting upon several pallets, one atop the other. The drums were found to be in good condition, closed and properly labeled. There was no evidence of leakage from any of the drums.

From the Corrosive Fill Room SAA we proceeded to the Solvent Fill Room SAA. Here I observed three 55-gallon metal drums. (Photos #2 and 3). One drum contained spent solvents. It was grounded and found to be closed and in good condition. A HAZARDOUS WASTE label was affixed and filled out. A second drum, also affixed with a HAZARDOUS WASTE label contained used rags. A third drum contained non-hazardous materials. It was affixed with a NON RCRA REGULATED WASTE label. There was no evidence of spillage on or around these drums.

We next proceeded to the 90-day hazardous waste storage area where hazardous wastes are temporarily stored in drums and large (330 gallon capacity) steel totes prior to off-site shipment.



Drums are placed on pallets which are in turn placed on racks. There are three rack levels, and each level has its own sprinkler system (more discussion below). I asked Mr. Linos if I could view up-close some of the drums on the higher racks. He arranged for the forklift operator to take down one pallet upon which rested two 55-gal PVC drums containing waste organic acid, dated 7/17/03 and 7/21/03. (Photo #4). The drums were properly labeled, closed and in good condition.

I asked Mr. Linos to bring down another pallet. Photo #5 shows a pallet removed from the storage rack with one 55-gal drum containing solid flammable liquid, D001, dated 7/22/03.

Photo #6 shows a 6" concrete berm which provides containment in the event of a release from the storage rack. Note in the photo how the concrete floor slopes slightly toward the center of the warehouse (*i.e.*, to the right of the photo).

Photo #7 shows a pallet removed from the storage rack, with one 55-gallon drum containing spent solvent, D001, D035, F003, F005, dated 7/16/03. The drum was properly labeled, closed and found to be in good condition.

Photo #8 shows a pallet removed from the storage rack. On it were four 55-gallon drums containing solid solvents, D001, D035, F003, F005. One of the drums (in foreground, to right of photo) was observed to be swollen. Mr. Linos made radio contact with a Univar USA employee, and the drum was promptly removed, vented and its contents were transferred to new drum.

I next observed five 330-gallon steel totes on the first level of the storage rack. These totes were affixed with HAZARDOUS WASTE labels. They contained flammable liquids, D001. The totes were closed and in good condition. There was no evidence of leakage anywhere in the rack containment system. (Photo #9.)

Photo #10 shows the sprinkler system for rack level 2. Each of the three levels has its own piping and array of sprinklers, allowing for water saturation immediately should a container ignite.

Photo #11 shows two large spill response boxes in the warehouse area. These are located approximately 75 ft from the 90-day hazardous waste storage area racks. The boxes include spill response kits. The photo also shows four fire extinguishers affixed to the spill kit boxes. The tags indicated the fire extinguishers are annually tested.

At the conclusion of the walk-through, Mr. Linos and I returned to the conference room whereupon I initiated the records review portion of the CEI at approximately 9:30 am.

I reviewed the facility's hazardous waste contingency plan, hazardous waste manifests for the past three years, the most recent (2002) annual hazardous waste report, container inspection logs and personnel training files. The contingency plan did not include a description of arrangements

with police and fire departments, hospitals and contractors. Mr. Linos stated he would address that issue immediately. (See "Follow Up" below.) All other records were in good order.

**Findings:**

The facility was found to be in compliance with the LQG and transporter requirements set forth at 35 Illinois Administrative Code §§ 721, 722, 765 and 766 (40 C.F.R. §§ 261, 262, 265 and 268), with the exception of 35 IAC § 725.152(c), (40 C.F.R. § 265.52(c)). The facility returned to compliance shortly after the CEI by submitting a description of the arrangements with local entities. (See Attachment No. 3.)

**Follow-up:**

On August 13, 2003, Mr. Linos faxed a description of the arrangements with the Bedford Park Fire and Police Departments, MacNeal Hospital and MacNeal Clearing Clinic and response contractors, Clean Harbors and SEC. This satisfies the contingency plan deficiency noted above.

**Attachments:**

1. Photo log
2. Inspection checklist
3. Description of Arrangements with Local Entities (faxed to U.S. EPA on August 13, 2003)

**ATTACHMENT NO. 1**

**PHOTO LOG**



**Photo No:** 1      **Date:** 7/25/03      **Site:** Univar  
**Description:** Corrosive Fill Room SAA: 1 55-gal HW; 3 55-gal non-HW.



**Photo No:** 2      **Date:** 7/25/03      **Site:** Univar

**Description:** Solvent Fill Room SAA: 1 55-gal solvent HW (grounded; foreground, to right); 1 55-gal solid (spent rags) HW (rear); 1 55-gal non-HW (foreground, to left).



**Photo No:** 3      **Date:** 7/25/03      **Site:** Univar

**Description:** Solvent Fill Room SAA: 1 55-gal solvent HW (rear, to right)  
foreground to right); 1 55-gal solid (spent rags) HW (left); 1 55-gal  
non-HW (foreground, to right).



**Photo No:** 4      **Date:** 7/25/03      **Site:** Univar

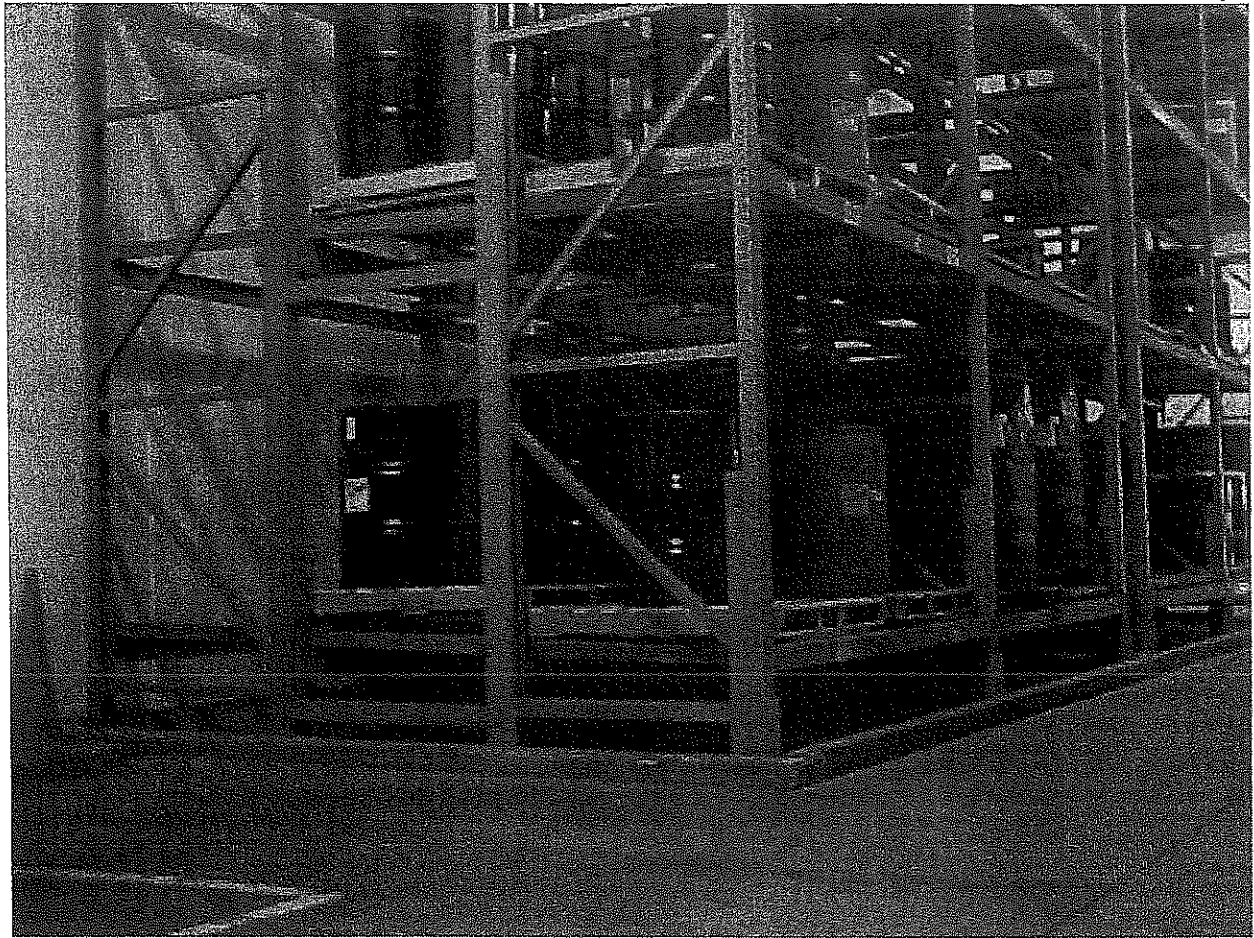
**Description:** 90-day Accumulation Area — pallet removed from storage rack; shows 2 55-gal PVC drums containing waste organic acid; dated 7/17/03 and 7/21/03.



**Photo No:** 5      **Date:** 7/25/03      **Site:** Univar

**Description:** 90-day Accumulation Area — pallet removed from storage rack;  
shows 1 55-gal drum containing solid flammable liquid, D001;  
dated 7/22/03.





**Photo No:** 6      **Date:** 7/25/03      **Site:** Univar

**Description:** 90-day Accumulation Area — shows diking around HW temporary storage area; note also how concrete floor outside diked area slopes toward center aisle (toward right of photo).



Photo No: 7      Date: 7/25/03      Site: Univar

Description: 90-day Accumulation Area — pallet removed from storage rack; shows 1 55-gal drum containing spent solvent, D001, D035, F003, F005; dated 7/16/03.



Photo No: 8      Date: 7/25/03      Site: Univar

Description: 90-day Accumulation Area — pallet removed from storage rack; shows 4 55-gal drum containing solid solvents, D001, D035, F003, F005; note drum in foreground, to right with bulging head. Drum was promptly removed, vented and contents were transferred to new drum.

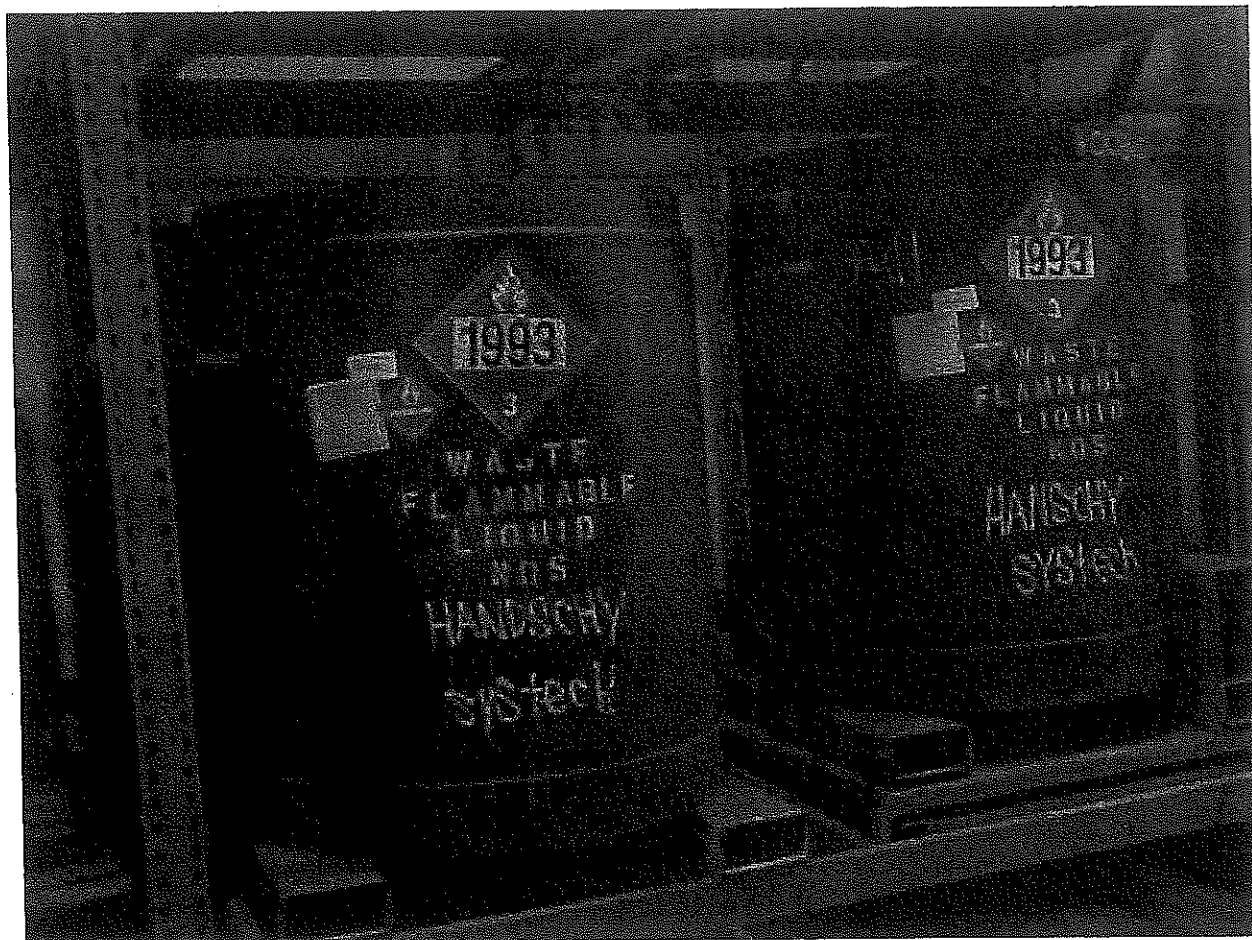


Photo No: 9      Date: 7/25/03      Site: Univar

Description: 90-day Accumulation Area — 5 330-gal steel totes containing waste flammable liquid, D001.



**Photo No:** 10    **Date:** 7/25/03    **Site:** Univar

**Description:** 90-day Accumulation Area — each level on rack has its own dedicated sprinkler; note piping and sprinkler on 2<sup>nd</sup> level, center of photo to left of drum.



Photo No: 11    Date: 7/25/03    Site: Univar  
Description: Spill Response kits, with four fire extinguishers.

**ATTACHMENT NO. 2**

**INSPECTION CHECKLIST**



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
2.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>  Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.134(a)	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.134(a)
722.134(a)(1)	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.134(a)(2)	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.134(a)(3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.134(a)(4)	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:  Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>  Has the generator closed an accumulation area? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If the containers have leaked or are in poor condition, has the owner/operator <u>transferred</u> the hazardous waste to a suitable container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

VENTED - TRANSFERRED

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274) <i>WEEKLY LOGS</i> <i>90-DAY and</i> <i>AA's</i>	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277) <i>WASTE STREAMS</i> <i>(AND PRODUCT)</i> <i>SEGREGATED</i>	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b> <i>NO HW TANKS</i></p>	
(725.211) (725.214)	<p>Has the generator closed an accumulation area?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p>	
	<p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291a)	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.291b)	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> <li>design standards for the tank and ancillary equipment?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>hazardous characteristics of the wastes?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>existing corrosion protection measures?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>documented age of the tank system?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>results of a leak test, internal inspection, or other tank integrity examination?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
	<p>*IRPE = Independent Registered Professional Engineer</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291c)	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	
(725.292a)	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____</li> <li>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____</li> <li>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____</li> <li>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____</li> <li>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____</li> </ol>	
(725.292g)	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293a)	<p>Is secondary containment provided for any new tank system before being put into service?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?</p> <p>Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?</p> <p>Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?</p> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?</p> <p>Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293b)	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?</p> <p>Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293c)	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and</p> <p>is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293d)	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____</p>	
(725.293e)	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	
(725.293f)	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____</p>	
(725.293i)	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294a)	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294b)	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls? Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls? Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____</p>	
(725.294c)	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295a)	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment? Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment? Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____</p>	
(725.295b)	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295c)	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p> <p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296d)		
(725.296e)	<p>c) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296f)	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297a)	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.297a)	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.297b)	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298a)	<p>Are ignitable or reactive wastes placed in a tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive?</li> </ul> <p>Yes _____ No _____ N/A _____</p> <ul style="list-style-type: none"> <li>- Section 725.117(b) is complied with?</li> </ul> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?</p> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.298b)	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? <b>FOR WAREHOUSE - LOUDSPEAKER SYSTEM</b> <b>2-WAY RADIOS</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? <b>SPRINKLERS 100% COVERAGE</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? <b>IN-HOUSE MONTHLY SPRINKLER/F.E. MAINTENANCE - ADVANCE FIRE &amp; SAFETY (BURNING IL)</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? <b>VIA 2-WAY RADIO</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151a)	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152a)	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152c) <i>Will address later</i>	Does the plan describe arrangements with:				
	- police and fire departments?	Yes _____	No <input checked="" type="checkbox"/>	N/A _____	
	- hospitals?	Yes _____	No <input checked="" type="checkbox"/>	N/A _____	
	- contractors?	Yes _____	No <input checked="" type="checkbox"/>	N/A _____	
	- emergency response teams?	Yes _____	No <input checked="" type="checkbox"/>	N/A _____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address?				
		Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
(725.152e)	Does the plan identify all emergency equipment including:				
	- description?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- capability?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- location?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	Is the list of emergency equipment up-to-date?				
		Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
(725.152f)	Does the plan include:				
	- an evacuation plan?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- an evacuation signal?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- alternate evacuation routes?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
(725.153)	Has the contingency plan (including all revisions) been:				
	a) maintained at the facility?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	b) submitted to:				
	- police department?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- fire department?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- hospital?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	- emergency response teams?	Yes _____	No _____	N/A _____	
(725.154)	Has the contingency plan been reviewed and revised whenever:				
	a) regulations are revised?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	b) the plan fails in an emergency?	Yes _____	No _____	N/A <input checked="" type="checkbox"/>	
	c) the facility changes in a way that modifies the emergency response necessary?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	d) information regarding emergency coordinators changes?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	e) information regarding equipment changes?	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
(725.155)	Is the emergency coordinator on-site or on call at all times?				
		Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?				
		Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?				
	<i>so do AUTOMATES</i>	Yes <input checked="" type="checkbox"/>	No _____	N/A _____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?				
		Yes _____	No _____	N/A <input checked="" type="checkbox"/>	
	<b>Note:</b> If the facility has had a release, explain in detail.				



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116a)	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116b)	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116c)	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116d)	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116e)	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107a4) b on-site TREATMENT	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste 722.134(c) limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.134(c)
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b>	
722.140(a)	<b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each <u>Annual Report</u> and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____ <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <u>✓</u>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <u>✓</u>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>✓</u>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>  Is the generator an exporter of hazardous waste? Yes _____ No <u>✓</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <u>✓</u>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>  Is the generator an importer of hazardous waste? Yes _____ No <u>✓</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <u>✓</u>	
	<b>SUBPART G: FARMERS</b>  Is the generator a farmer? Yes _____ No <u>✓</u> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <u>✓</u>	
	COMMENTS:	

TM:jab\722gen2.wpd

**ATTACHMENT NO. 3**

**DESCRIPTION OF ARRANGEMENTS WITH LOCAL ENTITIES**



P.O. Box 446  
Summit, IL 60501  
Phone: 708-728-6887  
Fax: 708-728-6883  
8500 W 68<sup>th</sup> street  
Bedford Park, IL 60501

**We have reviewed our operations with the Bedford Park Fire Department and Police Department so they are prepared to help in response to emergencies at our facility at 8500 West 68<sup>th</sup> Street in Bedford Park, IL, inside the Kinder Morgan Terminal at the same address. Both departments have a list of contacts for our facility, day and night numbers. Our security vendor calls Bedford Park 911 when alarms are activated at our facility. Both have been given a copy of our contingency plan. Annually they receive a copy of our Tier II report. They have access to our facility through the main gate and our emergency gate off of Shell Road on the south side of our facility. We have two Knox boxes with a key for the entire facility in them for their use. We invite them on an annual base to come walk through our facility to become familiar with our products, set up and capabilities. We have given them access to our Material Safety Data Sheets via the Internet.**

**Mac Neal Hospital and the Mac Neal Clearing Clinic are both aware of our business. They receive a copy of our contingency plan. They are aware of the nature of the materials we handle and store. They are prepared to handle medical emergencies dealing with our product line.**

**Clean Harbors and SEC are both set up with us for clean up and remediation.**

**Marc Linos  
Branch Operations Manager  
Univar UAS Inc.  
Bedford Park**



## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☒ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name : Univar USA

Facility Location: 8500 W. 68th St

City: Bedford Park State: IL

U.S. EPA ID# ILR 000 034 .389

Assigned Staff M. Valentino Phone: 886-4582

Name	Signature	Date
Author	<i>Michael Valentino</i>	<i>2-25-04</i>
Regional Counsel	<i>N/A</i>	
Section Chief	<i>Laura M. Jones</i>	<i>2/25/04</i>
Branch Chief		

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

*Raza - Pls make complete copy of all attachments for me.  
Thank you.  
huv*